## UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

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In re:	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO et al.,	:	(Jointly Administered)
	:	
Debtors. <sup>1</sup>	:	
	X	

CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C. § 1746
REQUESTING ENTRY, WITHOUT A HEARING, OF ORDER AUTHORIZING
EMPLOYMENT AND RETENTION OF GENOVESE, JOBLOVE & BATTISTA, P.A.
AS SPECIAL LITIGATION COUNSEL TO OFFICIAL COMMITTEE OF
UNSECURED CREDITORS, PURSUANT TO BANKRUPTCY CODE SECTION 1103(a)
AND LOCAL BANKRUPTCY RULE 2014-1(e), EFFECTIVE AS OF APRIL 16, 2019

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the *Order Further Amending Case Management Procedures* [Docket No. 7115] (the "<u>Case Management Procedures</u>"), the undersigned hereby certifies as follows:

1. On April 30, 2019, the Official Committee of Unsecured Creditors of all Title III Debtors (other than COFINA) (the "Committee") filed and served the *Application for Order*, *Pursuant to Bankruptcy Code Section 1103(a) and Local Bankruptcy Rule 2014-1(e) Authorizing Employment and Retention of Genovese, Joblove & Battista, P.A. as Special Litigation Counsel* 

The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal to

bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474), and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747).

to Official Committee Of Unsecured Creditors, Effective as of April 16, 2019 [Docket No. 6661] (the "Application").<sup>2</sup>

- 2. The deadline to object or file a response to the Application was May 28, 2019 at 4:00 p.m. (ET) (the "Objection Deadline"). Counsel to the Committee has reviewed the Court's docket not less than forty-eight (48) hours after expiration of the Objection Deadline, and, to the best of counsel's knowledge, no objection, other responsive pleading, or request for a hearing with respect to the Application has been filed with the Court on the docket of the above-referenced case in accordance with the procedures set forth in the Case Management Procedures, nor has any objection, other responsive pleading, or request for hearing with respect to the Application been served on counsel to the Committee to date.
- 3. The Case Management Procedures provide that the Court may approve the relief requested in a pleading without a hearing provided that (i) the notice filed with the request for relief includes a statement that the request for relief may be granted and an order entered without a hearing unless a timely objection is made, (ii) no objection, responsive pleading, or request for a hearing has been filed by the applicable objection deadline, and (iii) not less than forty-eight (48) hours after the objection deadline, the attorney for the moving party files with the Court a certificate stating that no objections, responsive pleading, or request for hearing with respect to such pleading have been filed or served upon the moving party, along with an order granting the relief requested in the applicable pleading.
- 4. Attached hereto as <u>Exhibit A</u> is a copy of the proposed Order, which is identical to the version attached to the Application, except that, at the request of the Fee Examiner, GJB

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not defined herein have the meanings ascribed to them in the Application.

has agreed that its 20% fee discount will be applied to their hourly rates (as opposed to total fees sought).

5. Attached hereto as <u>Exhibit B</u> is a blackline version of the proposed Order marked to show the changes that have been made to the version attached to the Application.

[Remainder of page intentionally left blank.]

6. For the reasons set forth in the Application, the Committee respectfully requests that the proposed Order attached hereto as <a href="Exhibit A">Exhibit A</a> be entered in accordance with the procedures described in the Ninth Amended Case Management Procedures.

I declare that the foregoing is true and correct.

Dated: May 30, 2019 /s/ G. Alexander Bongartz

PAUL HASTINGS LLP
Luc. A. Despins, Esq. (Pro Hac Vice)
James R. Bliss, Esq. (Pro Hac Vice)
Nicholas A. Bassett, Esq. (Pro Hac Vice)
G. Alexander Bongartz, Esq. (Pro Hac Vice)
200 Park Avenue
New York, New York 10166
Telephone: (212) 318-6000
lucdespins@paulhastings.com
jamesbliss@paulhastings.com
nicholasbassett@paulhastings.com
alexbongartz@paulhastings.com

Counsel to the Official Committee of Unsecured Creditors

- and -

CASILLAS, SANTIAGO & TORRES LLC Juan J. Casillas Ayala, Esq. (USDC - PR 218312) Alberto J. E. Añeses Negrón, Esq. (USDC - PR 302710) Israel Fernández Rodríguez, Esq. (USDC - PR 225004) Juan C. Nieves González, Esq. (USDC - PR 231707) Cristina B. Fernández Niggemann, Esq. (USDC - PR 306008)

PO Box 195075 San Juan, PR 00919-5075

Tel.: (787) 523-3434 Fax: (787) 523-3433 jcasillas@cstlawpr.com aaneses@cstlawpr.com ifernandez@cstlawpr.com jnieves@cstlawpr.com cfernandez@cstlawpr.com

Local Counsel to the Official Committee of Unsecured Creditors